

Communication on Progress

UN Global Compact

January 2013





Introduction

Wilbury Stratton is an international Executive Search firm specialising in Corporate Sustainability. We have offices based in London, Brighton, Hong Kong, Melbourne and New York.

As a signatory to the UN Global Compact, this report communicates our progress in support of the Global Compact's objectives.

Statement of Continued Support

This report outlines Wilbury Stratton's performance against the four main areas of the UN Global Compact – Human Rights, Labour, Environment and Anti-Corruption.

Wilbury Stratton became a signatory in 2010. As a company undertaking analysis and recruitment within the Sustainability arena, we feel that our ethics and principles suitably reflect the values of the Global Compact. As Director, I am fully committed to integrating the Global Compact into our business strategy, culture and operations and I continue to utilise the ethics that form the Global Compact principles to provide a solid basis upon which my business can grow and succeed.

2012 has bought many challenges for Wilbury Stratton. Due to the world economic climate we have been forced to streamline our national and international operations to ensure the survival of the business. However, when making tough business decisions I have always sought to take in to consideration how the principles of the Global Compact affect our conduct, and I believe that Wilbury Stratton has acted with integrity and justification in all its business dealings largely due to our continued efforts to comply with the values laid out within the Global Compact.

Sadly, we have not managed to achieve as much as we had planned with regards to our sustainability steering group, partnership projects or community engagement, as it has been fundamental for us to concentrate on the core business needs in order to ensure economic success. However, I still have a very strong desire to develop a five year strategy that will see important changes made to the business in the future with regards to the implementation of the Global Compact Principles. I am hopeful that the increased economic stability of the business in the coming months will amplify our ability to move forward and achieve our goals, and I look forward to reporting the growing maturity of our development in 2013.

Dan Chester, Chief Executive Officer





Human Rights Principles

Principle 1: Business should support and respect the protection of internationally

proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses

Wilbury Stratton is committed to the protection and well-being of all of our employees; we endeavour to create a safe, positive and professional working environment for all staff whether permanent, part-time or temporary.

Our Principles of Operations policy clearly outlines that we work in a fair and ethical manner and expect our suppliers and business partners to apply the same high standards. We comply with all relevant national and international laws through regular training and assessment. Training covers areas such as:

- Data Protection Legislation and Government Guidance
- The Equality Act 2010 and Government Guidance
- The Conduct of Employment Agencies and Employment Businesses Regulations and related amendments.

Wilbury Stratton is an equal opportunities employer. Our Equality and Diversity Policy (provided in full in Appendix A) outlines that we refuse to accept any unlawful discrimination in our business activities based on age, disability, gender reassignment, marital status, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

When working with clients with operations in developing countries we strive to influence their compliance with international legislation and regulations. All of our consultants have a strong understanding of the various laws, regulations and restrictions within the practice area in which they recruit. Child Labour laws and Human Rights legislation are some of the issues that need to be taken into consideration when searching and selecting candidates for international organisations. We do not condone violation of the Human Rights principles by any person or company we associate with.

All of our policies are periodically reviewed by senior management to ensure they are up to date and in line with the Global Compact principles.





Labour Principles

Principle 3: Businesses should uphold the freedom of association and the effective

recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation

Our employees

Wilbury Stratton fully complies with the labour laws of the countries we operate in. These include:

- minimum wage;
- maximum working hours;
- minimum working age;
- paid time off;
- sickness and absence entitlements.

We oppose all forms of unlawful and unfair discrimination and provide diversity and equality to all in employment irrespective of gender, race, religion, sexual orientation or disability (our equality and diversity policy is available in full in Appendix A). All new employees are issued with our Equality and Diversity policy and required to read and agree the information outlined in the document.

We believe that every employee is entitled to a working environment that promotes dignity and respect for all. We do not tolerate intimidation, bullying or harassment in the workplace. All employees are made aware that any staff found in breach of our equality and diversity policy could be found to have committed gross misconduct and as a result face dismissal.

Selection for employment, promotion, training or any other benefit is based solely on aptitude and ability. All employees are helped and encouraged to develop their full potential and feel supported in the workplace. This is demonstrated by regular training, regular appraisals and bonus schemes.

Wilbury Stratton has a clear career progression and promotion policy which all employees have access to.

We have a health and safety policy that all employees are aware of (available in full in Appendix B). All health and safety issues are managed and monitored by our Office Manager.

Although we have undergone some staffing changes during 2012, all decisions were made on a justifiable basis. Business efficacy demands a constant review of targets and a disciplined approach to performance management to ensure employees with deteriorating results are given ample opportunity to achieve their goals. Management take responsibility for continual assessment of performance versus achievement, including projected sales, with the intention that the business is never put in to a position where personnel are failing to attain their targets. In order to remain





successful in a very competitive market place it is essential that the business remains focused and streamlined in favour of those employees making profit, this is a policy that is fully understood by the staff and therefore our decision to downside resulting in the loss of certain employees, although uncomfortable, will be a long term tangible benefit to all.

Our clients, candidates and suppliers

We make every effort to engage and support our international clients in moving towards compliance with international labour legislation. We actively support the abolition of child labour and the elimination of discrimination in the workplace and encourage our clients to do the same.

When sourcing suppliers, we make every attempt to source locally whenever possible.

We continuously assess are own policies to ensure we are complying with local laws and going beyond basic legal requirements. As well as this we also monitor the behaviour of clients, candidates and suppliers we engage with to ensure they are moving towards a more positive working environment in line with international legislation.





Environmental Principles

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies

At Wilbury Stratton we make every effort to take a precautionary approach to environmental challenges. We realise that our organisation has an impact on the environment and as a result take our responsibility in supporting initiatives that prevent and manage environmental risk very seriously.

We strive to minimalise our impact on our environment by:

- Providing recycling facilities in all of our offices and encouraging a paperless organisation.
- Taking careful consideration when printing marketing materials and ensuring we only print as many as needed.
- Having centrally based offices in all of our locations so employees are able to walk, cycle or use public transport to get to work.
- Minimising energy costs where possible including installing movement sensor lights and implementing a policy where all equipment must be turned off when not in use.
- Using local suppliers wherever possible.
- Choosing suppliers who have suitable sustainability credentials.
- Having global offices in locations where we carry out a significant amount of work to save on travel.
- Engaging in virtual meetings and using teleconferencing.
- Encouraging sustainability initiatives in our wider sphere of influence.

All employees of Wilbury Stratton understand the importance of protecting our environment and are made aware of the company's environmental policies.

Senior management regularly monitor and review our impact and precautionary approach to the environment and are constantly looking for ways in which we can do more.

The last 12 months we have been carefully monitoring and analysing our impact on the environment as well as the precautionary measures we have taken. Our next steps are to increase and improve our environmental initiative and ensure it is fully integrated into our overall business strategy. To help us implement this successfully we will be launching a Carbon Management Plan for 2013.





Anti-Corruption Principles

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

Wilbury Stratton has a zero-tolerance approach for corruption, bribery and extortion. All employees of Wilbury Stratton are made aware that bribery, corruption and extortion in any form is not tolerated within our organisation under any circumstances.

We fully support the UN Convention against Corruption. All of our employees are familiar with the UK Bribery Act and understand they must comply with it.

All of our consultants are familiar with anti-corruption legislation within the practice they work in and understand this must be taken into consideration when working with international organisations.

It is now imperative we take our approach to anti-corruption further. In 2013 we will be implementing a policy on whistle-blowing and ensuring employees of Wilbury Stratton are confident in reporting and managing incidents of corruption.

Appendix A

Equality and Diversity Policy

The purpose of this policy is to provide diversity and equality to all in employment, irrespective of their gender, race, ethnic origin, disability, age, nationality, national origin, sexuality, religion or belief, marital status and social class. We oppose all forms of unlawful and unfair discrimination.

All employees, whether part time, full time or temporary, will be treated fairly and equally.

Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.

All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Our commitment:

- Every employee is entitled to a working environment which promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- The commitment to diversity and equality in the workplace is good management practice and makes sound business sense.





- Breaches of our diversity and equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by senior management and has been agreed with trade unions and employee representatives.
- The policy will be monitored and reviewed annually.

The law

This policy will be implemented within the framework of the relevant legislation, which includes:

- Equal Pay Act 1970 (Equal Value Amendment 1984)
- Rehabilitation of Offenders Act 1974
- Sex Discrimination Act 1975 (Gender Reassignment Regulations 1999)
- Race Relations Act 1976
- Disability Discrimination Act 1995
- The Protection from Harassment Act 1997
- Race Relations (Amendment) Act 2000
- Race Relations Act 1976 (Amendment) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003
- Disability Discrimination Act 2005
- Employment Equality (Age) Regulations 2006
- Equality Act 2010.



Appendix B – Health & Safety Policy



Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

Abi Chester - Office Manager

STATEMENT OF GENERAL POLICY	RESPONSIBILITY OF: Name/Title	ACTION/ARRANGEMENTS (customise to meet your own situation)
To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.	Abi Chester Office Manager	Relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed every year, or earlier if working habits or conditions change.)
To provide adequate training to ensure employees are competent to do their work.	Abi Chester Office Manager	Staff and subcontractors given necessary health and safety induction and provided with appropriate training (including working at height, asbestos awareness and electrical safety) and personal protective equipment. We will ensure that suitable arrangements are in place to cover employees engaged in work remote from the main company site.
To engage and consult with employees on day-to-day health and safety conditions and provide advice and supervision on occupational health.	Abi Chester (Office Manager) All staff	Staff routinely consulted on health and safety matters as they arise but also formally consulted at regular health and safety performance review meetings or sooner if required.
To implement emergency procedures – evacuation in case of fire or other significant incident.	Zoe Page – Fire Warden	Escape routes well signed and kept clear at all times. Evacuation plans are tested from time to time and updated as necessary.
To maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances.	Abi Chester Office Manager	Toilets, washing facilities and drinking water provided. System in place for routine inspections and testing of equipment and machinery and for ensuring that action is promptly taken to address any defects.

Health and safety poster is displayed:				
First-aid box and accident book are located:	In Kitchen			
Accidents and ill health at work reported under RIDDOR:				
(Reporting of Injuries, Diseases and Dangerous Occurrences				
Regs) www.hse.gov.uk/riddor Tel: 0845 300 9923				
Signed: (Employer)		Date:	01/01/2013	
Subject to review, monitoring and revision by:	Dan Chester	Every:	12	months or sooner if work activity changes

